

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 11-cr-10212-JLT
)
 1. JOHN WILLIS)
 2. BRANT WELTY)
 3. PETER MELENDEZ)
 4. AIBUN ENG)
 5. BRIAN BOWES)
 6. KEVIN BARANOWSKI)
 7. MICHAEL CLEMENTE)
 12. BRIDGET WELTY)
 14. COLBY DEERING)
 15. ANH NGUYEN)
)
 Defendants.)

UNITED STATES' MOTION FOR ORDERS OF FORFEITURE

The United States of America, by its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby moves that this Court issue a single Preliminary Order of Forfeiture as to particular seized and restrained property, and separate criminal forfeiture money judgment orders as to various defendants, all in accordance with Title 21, United States Code, Section 853, Title 18 United States Code, Section 982(a)(1), Title 31, United States Code, Section 5317(c), Title 28, United States Code, Section 2461(c), and Rule 32.2(b) and (e) of the Federal Rules of Criminal Procedure with respect to Defendants JOHN WILLIS, BRANT WELTY, PETER MELENDEZ, AIBUN ENG, BRIAN BOWES, KEVIN BARANOWSKI, MICHAEL CLEMENTE, BRIDGET WELTY, COLBY DEERING, and ANH NGUYEN (hereafter, collectively, "Defendants"), for the reasons set forth below.

On May 26, 2011, a federal grand jury sitting in this District returned an Indictment (the "Indictment") charging Defendants John Willis, Brant Welty, Peter Melendez, Aibun Eng, Brian

Allowed
J. Tan 81
6/3/13